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April 15, 2024

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 4/16/2024

Honorable Vernon S. Broderick
U.S. District Judge
Southern District of New York
500 Pearl St,
New York, NY 10007

Re: Joshua Adams vs. N&J Salam Corp.
Civil Action No.: 1:24-cv-00971-VSB
Motion for Extension of Time - In RE: The Court's April 1, 2024 Order [DE#11]

Dear Honorable District Judge Broderick,

We represent Plaintiff in the above-styled action.

Pursuant to the Court's April 1, 2024 Order [DE#11], the Plaintiff is required to file a Motion for Default Judgment by Order to Show Cause on or before April 15, 2024.

Plaintiff herein beseeches the Court for an extension of time to file the Motion for Default, at Your Honor's sagacious discretion, for at least 7 days from the date of this filing. The grounds for granting such a motion are as follows. Due to an inadvertent administrative oversight, our Law Offices had not noticed this calendared filing, requiring the motion pursuant to Rule 4 - Sub-Paragraph H of the Court's Individual Rules of Practice, to be filed on Monday. Moreover, the Plaintiff submits that this error was not in bad faith, and additional time is necessary to apply for the Clerk Certificates of Default before the Motion could be filed today. Finally, the Plaintiff contends that justice would be best served if an extension of time were granted, as this is the first request for such an extension in this civil action.

For these reasons, Plaintiff requests at least a 7-day extension of time, and apologizes to the Court for necessitating such a motion, and avers that the same will not happen in the future if the motion is granted.

This extension will not affect any other deadlines or events in this case.

Thank you for your time in considering this request.

Most Respectfully,

/s/ Maria-Costanza Barducci

BARDUCCI LAW FIRM PLLC

Maria-Costanza Barducci Esq.

cc: Via CM/ECF Only